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7 **UNITED STATES DISTRICT COURT**  
8 **WESTERN DISTRICT OF WASHINGTON**  
9 **AT TACOMA**

10 DANA LYNN SARGENT,  
11 Plaintiff,  
12 v.  
13 THE STATE OF WASHINGTON, LISA  
GILMAN, in her official and personal  
capacity,  
Defendants.

NO.  
AFFIDAVIT OF  
PATRICIA D. TODD IN  
SUPPORT OF REMOVAL TO  
FEDERAL COURT

14 State of Washington )  
15 ) ss.  
County of Thurston )

16 I, Patricia D. Todd, being first duly sworn upon oath, testify as follows:

17 1. I am the assistant attorney general assigned to represent Defendants. I am over  
18 the age of 18, competent to testify as to the matters stated herein, and make this declaration based  
19 on my personal knowledge.

20 2. The State of Washington was served with Plaintiff's Complaint in the  
21 above-entitled matter on February 6, 2018.

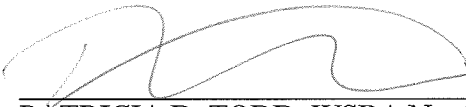
22 3. This case involves a claim that plaintiff was deprived of her constitutional rights  
23 pursuant to 42 U.S.C. § 1983 as well as related state law claims.  
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4. The individual that can be identified in the Complaint, Defendant Gilman, has been served with the summons and complaint. Ms Gilman agrees to Removal to Federal Court.

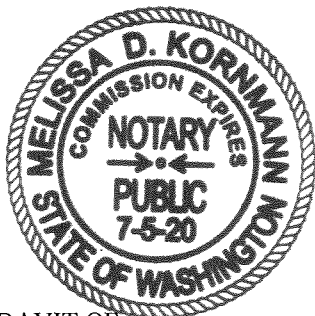
4. True and correct copies of the documents filed in the Thurston County Superior Court File No. 18-2-00626-34 will be filed with this Court within fourteen (14) days as specified in LCR 101(b).


DATED this 16<sup>th</sup> day of February, 2018.

ROBERT W. FERGUSON  
Attorney General

  
PATRICIA D. TODD, WSBA No. 38074  
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Attorneys for Defendants

I certify that I know or have satisfactory evidence that Patricia D. Todd is the person who appeared before me, and said person acknowledged that she signed this instrument, on oath stated that she is authorized to execute the instrument and acknowledged it on this 16<sup>th</sup> day of February, 2018, to be the free and voluntary act of such party for the uses and purposes mentioned in this instrument.



  
NOTARY PUBLIC in and for the State of  
Washington, residing in Thurston County,  
Washington.  
My Commission Expires: 7/5/20

**CERTIFICATE OF SERVICE**

I hereby certify that on this 16<sup>th</sup> day of February, 2018, I caused to be electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system and caused to be served a copy of this document on all parties or their counsel of record on the date below as follows:

***Counsel for Plaintiff***

Law Office of Susan B. Mindenbergs  
Susan B. Mindenbergs, WSBA #20545  
705 Second Avenue, Suite 1050  
Seattle, Washington 98104  
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and

Law Office of Vonda Sargent  
Vonda Sargent, WSBA #24552  
119 First Avenue South, Suite 500  
Seattle, Washington 98104  
[sisterlaw@me.com](mailto:sisterlaw@me.com)

I declare under penalty of perjury under the laws of the state of Washington that the foregoing is true and correct.

DATED this 16<sup>th</sup> day of February, 2018, at Tumwater, Washington.

ROBERT W. FERGUSON  
Attorney General

/s/Patricia D. Todd  
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